

NPDES Inspection Report

Permit # WAR05I001

Omak Forest Products, LLC

Omak, WA

September 15, 2016

Prepared by:

Matt Vojik

Environmental Protection Agency (EPA), Region 10

Office of Compliance and Enforcement (OCE)

Multimedia Inspection & RCRA Enforcement Unit (MIREU)

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ATTACHMENT A – Site Plan & Aerial Image

ATTACHMENT B – Photograph Log

ATTACHMENT C – CD of Electronic Files

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Yancy Epperson or from observations during the inspection.)

I. Facility Information

Facility Name: Omak Forest Products, LLC

Facility Owner/Operator: Colville Tribal Federal Corporation

Facility Operator: Omak Forest Products, LLC

Physical Address: 1100 8th Ave. East, Omak, WA 98841

Lat/Long: 48.400142°, -119.509916°

Mailing Address: PO Box 2119, 1100 8th Ave. East, Omak, WA 98841

NAICS Code: 321212 – Softwood Veneer & Plywood Manufacturing

Facility Contacts: Yancy Epperson, Safety/Environmental Manager
Office Phone: 509-557-4808
Cell Phone: 509-634-1008
Email: yepperson@omakwood.com

Conney Chaney, Environmental Supervisor
Primary Phone: 509-557-4833
Secondary Phone: 509-322-7348
Email: cchaney@omakwood.com

Permit Number: WAR05I001

II. Inspection Information

Inspection Date: September 15, 2016

Inspectors: Matt Vojik, Inspector
EPA Region 10, OCE / MIREU
Phone: 206-553-0716

Arrival Time: 8:27 AM

Departure Time: 12:45 PM

Weather: Sunny

Purpose: To determine whether the facility is in compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

This facility is permitted under NPDES Multi-Sector General Permit (MSGP) number WAR05I001 for stormwater discharges associated with industrial activity. According to the EPA's Integrated Compliance Information System (ICIS), the permit became effective on February 12, 2016 and the expiration date of the permit is June 3, 2020. The facility operates under MSGP Sector A (Timber Products).

IV. Background

Omak Forest Products (OFP) is a plywood veneer manufacturing plant that occupies 60 acres on the Colville Indian Reservation. The facility includes a log yard, log block line, debarker, boiler, machine shop, mechanic shop, fueling station, eleven log vats and various storage areas for scrap lumber, wood chips and hog fuel.

The facility has operated in this location under various businesses for over 100 years and was purchased by the Colville Tribal Federal Corporation in 2001. The facility closed during the economic downturn in 2008 and reopened in 2013 as Omak Wood Products, a subsidiary of Atlas Holdings, LLC. In February 2016, the business was purchased by OFP, a company registered by Mr. Richard Yarbrough, according to the website of the Washington Secretary of State. After the inspection, the Colville Tribal Tribune reported that OFP announced plans to close the facility again on January 29, 2017.¹

In 2014, the facility entered into a compliance order on consent (10-2014-0095) under the Clean Air Act in response to alleged air emission opacity limits and other violations. The facility failed to abide by the terms and conditions of the 2014 order, which was followed by a consent agreement and final order (10-2016-0117) and a penalty of \$89,000.

According to RCRAinfo, the facility (RCRA ID# WAD000800912) is also a conditionally exempt small quantity generator (CESQG) of hazardous waste.

V. Inspection Chronology

This was an unannounced inspection. I arrived at the facility at 8:27am on September 15, 2016. I introduced myself to the guards at the entrance and they contacted Mr. Yancy Epperson, Safety/Environmental Manager and he came to meet me at the guard shack. I presented my credentials to Mr. Epperson. I was accompanied throughout the inspection by facility representatives. I was not denied access to the facility.

¹ http://www.tribaltribune.com/news/article_d748fb26-c0d3-11e6-b2f9-1b65c425f1ad.html

I began the inspection with a brief opening conference with Mr. Epperson in his office. I provided him with an EPA Small Business Resources Information Sheet, took a tour of the facility and conducted a records review. We ended with a closing conference to discuss observations and next steps.

Although I did not contact the facility prior to the inspection, on September 1, 2016, I called Mr. Douglas Marconi, Nonpoint Source Management Coordinator for the Watershed Program of the Confederated Tribes of the Colville Reservation (CTRC) Environmental Trust Office (ETO) to discuss the planned inspection. I also provided an email notification to the following representatives of the CTRC ETO Watershed Program: Mr. Gary Passmore, Program Manager, Mr. Todd Thorn, Watershed Manager and Ms. Amelia Marchand, Water Regulatory Specialist.

VI. Opening Conference

Mr. Epperson explained that OFP processes logs through a block line and debarker to create eight-foot blocks, which are steamed in log vats and peeled into veneer. The veneer is glued to make plywood. Wood chips and wood cores are sold to other companies, such as Legacy Lumber, Stampede Forest Products and Boise Cascade. Mr. Epperson said that the facility does not chemically treat lumber at the facility.

The facility operates 24 hours per day, seven days per week with a workforce of approximately 200 employees. Mr. Epperson has worked at the facility for two years. Ms. Connie Chaney, Environmental Supervisor, was in Wenatchee for a doctor's appointment and unavailable at the time of the inspection.

Mr. Epperson said that stormwater is collected in a pond and used to spray the log yard, so that no discharge occurs during normal operations. An unnamed creek flows along the eastern boundary of the facility into the Okanogan River approximately 0.35 miles north of the facility.

VII. Site Review

Mr. Epperson took me on a tour of the outdoor areas of the facility. A site map and aerial image appear in **Attachment A** and a photograph log appears in **Attachment B**.

Outside the main office in the paved area southwest of the plywood plant, I inspected a catch basin that was receiving flow at the time of the inspection (**Photo 1**). Mr. Epperson attributed this flow to a leak in the tribal water distribution system. He said there were multiple water main leaks on the property. To the northeast of the plywood plant, I inspected another catch basin, which was surrounded by dirt and weeds (**Photo 2**). To the south of the plywood plant, Mr. Epperson showed me the approximate location of another catch basin, but the area was covered in woody debris (**Photo 3**) and the catch basin was not visible at the time of the inspection. It was unclear whether this catch basin had been officially plugged and decommissioned or whether the catch basin could be returned to use by removing the debris.

According to Mr. Epperson, the catch basins channel flow to the catchment pond that borders the north end of the property along Omak Avenue. Mr. Epperson said that the pond was approximately 15-20 feet deep and 10 feet wide. Portions of the pond were heavily loaded with sediment (**Photo 4**) at the time of the inspection. He said that OFP had been trying to get a company to come and remove the sediment for approximately one and a half months before the inspection.

The catchment pond drains to a sump (**Photo 5**) in the northeast corner of the property. This flow is augmented by well water and sprayed onto the log piles (**Photo 6**) to keep the logs fresh.

I inspected the northeast boundary of the property, where a dirt access road and small berm separated the log pile area from the vegetated bank of an unnamed creek (**Photo 7**). Midway down the slope of this vegetated bank, I observed a silt fence that was in need of maintenance (**Photo 7**). I asked why the silt fence was not located upslope closer to the berm to help contain stormwater onsite. Mr. Epperson said that environmental representatives of the tribe had recommended the location of the of the silt fence.

To the southeast of the log pile area, I observed piles of soil and woody debris (**Photo 8**) along the dirt access road above the creek. Near the southeast corner of the facility, I observed large piles of hog fuel abutting the west side of the dirt road (**Photo 9**). To the east of the log processing areas near the center of the facility, I saw that this dirt road formed an elevated barrier between the creek and heavy industrial activities at the facility (**Photo 10**).

I inspected the hog fuel processing area and conveyor system (**Photo 11**), which is used to fuel the boiler. In the unpaved area south of the conveyor system, I observed pooling water from a leaking spigot (**Photo 12**). I also observed an open container of wet ash (**Photo 13**) scrubbed from the boiler exhaust. Mr. Epperson said this wet ash waste is taken to a nearby tribal solid waste landfill for disposal. South of the boiler, I observed an open dumpster and bags of salt stacked on the pavement (**Photo 14**).

Around the exterior of the machine shop, I observed open dumpsters containing scrap metal (**Photo 15**) and a broken fluorescent lamp (**Photo 16**). Mr. Epperson said that waste fluorescent lamps are typically stored in the electrical room and then taken to a recycling company.

Outside the machine shop, I observed multiple containers (**Photo 17**), including an orange drum, which contained parts washer solvent, according to Mr. Epperson. I noted that the metal ring was not bolted to secure the lid on this drum. Mr. Epperson lifted the lid and I observed fluid inside the drum (**Photo 18**). In this area, I also observed an open bucket of oil (**Photo 19**) on the ground. Mr. Epperson said he did not know why the solvent drum and oil bucket were stored outside. He placed the bucket of oil inside the machine shop. Mr. Epperson said that Whitley Fuel picks up used oil from the facility and Safety Kleen services the facility's parts washers.

Outside the boiler building, I observed totes of dark fluid, which Mr. Epperson identified as compressor oil (**Photo 20**). He said that the totes had been left behind by the tribe and have been located in this area since before he started working at the facility approximately two years ago. It was not clear whether this oil was a waste or a product. Outside the log vat building, I also

observed a drum of defoamer, labeled as D-FOAM 325 (**Photo 21**) and additional totes of dark fluid (**Photo 22**). Mr. Epperson said that he was not familiar with these totes, because they had been placed there while he was on vacation the previous week. He speculated that these totes contained gear oil. It was not clear whether this oil was a waste or a product. In this area, I also inspected the concrete tank that contained hot liquid used to steam the log vats. I noted that the walls of this tank were cracked and stained (**Photo 23**). Mr. Epperson said that the hot liquid consisted of a mixture of water and defoamer.

I looked inside one of the log vats (**Photo 24**). Mr. Epperson said that log vat fluid seeps out through the bottom of the vat doors and into a small exterior concrete trench that channels fluid to a sump (**Photo 25**) before the fluid is recirculated to the concrete tank. He said that this trench was installed during a boiler shutdown in 2015, but the trench only extends far enough to collect escaped fluid from vats 4 through 11. Because the facility operates 24 hours per day, he said that they will not have the opportunity to extend the trench to vats 1-3 until the next boiler shutdown, scheduled for October 2016. Any fluid that escapes vats 1-3 is released to the ground, where it is exposed to stormwater.

On the south side of the log vat building, I observed bags of salt on the ground (**Photo 26**). To the west of the log vat building, I observed piles of wood debris (**Photo 27**), which the facility uses as hog fuel, and piles of wood chips (**Photo 27**), which are sold to other companies. Mr. Epperson said that wood chips are collected in bins for pick-up, but the bins were full at the time of the inspection, so the excess wood chips were being stored in piles on the ground.

I inspected the bag house and steam vent on the south side of the plywood plant (**Photo 28**). Mr. Epperson said that the bag house collects dust from the sander in the plywood plant. Sawdust is then mixed with hog fuel for use in the boiler. In this area, I observed sawdust and steam condensate on the ground (**Photo 29**). Mr. Epperson said that the plywood plant was equipped with tanks and pumps to contain steam condensate, but the pumps were leaking at the time of the inspection.

Also near the plywood plant, I observed another open dumpster (**Photo 30**) and an outdoor fueling station (**Photo 31**). To the north of the plywood plant, I also inspected the unpaved delivery entrance (**Photo 32**) to the facility. In this area, I observed dust in the air from industrial vehicle traffic and dirt tracked onto Omak Avenue (**Photo 33**).

Mr. Epperson also said that the facility maintains a four million-gallon pond on a nearby hill to supply the emergency fire suppression system. He said that the last fire occurred in 2005, when the block line debarker burned down. I did not inspect this pond during the inspection.

I did not observe a discharge to surface water at the time of the inspection.

VIII. File Review

I reviewed the following records:

- Stormwater Pollution Prevention Plan (SWPPP) dated February 2015 (**Attachment C**), which had been emailed by Ms. Chaney to the Ms. Margaret McCauley at the EPA on

May 27, 2015. The SWPPP was prepared by ENVIRON International Corporation, but Mr. Epperson said that the facility had been working with a different environmental consultant, ESC, based in Mississippi, to revise the SWPPP.

- Quarterly Stormwater Inspection Form dated December 21, 2015
- Quarterly Stormwater Visual Assessment Form dated December 21, 2015

IX. Areas of Concern

I noted the following areas of concern:

A. Non-Stormwater Mixed with Stormwater

Section 2.1.2.9 of the MSGP states that “you must evaluate for the presence of non-stormwater discharges. Any non-stormwater discharges not explicitly authorized in Part 1.1.3 or covered by another NPDES permit must be eliminated.”

AND

Section 1.1.4.1 of the MSGP states that “stormwater discharges that are mixed with non-stormwater discharges, other than those mixed with allowable non-stormwater discharges listed in Part 1.1.3... are not eligible for coverage under this permit.”

During the inspection, I observed the following areas where non-stormwater was exposed to stormwater. I did not see these sources of non-stormwater evaluated in the SWPPP:

- I inspected the concrete tank (**Photo 23**) of hot liquid used to steam the log vats. I noted that the walls of this tank were cracked and stained and that moisture was visible on portions of the tank exterior. Mr. Epperson said that the hot liquid consisted of a mixture of recirculated log vat water and defoamer (**Photo 21**).
- I inspected the log vats (**Photo 24**) used to prepare logs for peeling. Mr. Epperson said that log vat fluid seeps out through the bottom of the vat doors and into a small exterior concrete trench that channels fluid to a sump (**Photo 25**) prior to reuse. I noted that the small trench is exposed to stormwater and may have the potential to overflow during a storm event. Mr. Epperson also said that the trench only extends far enough to collect escaped fluid from vats 4 through 11. Any fluid that escapes vats 1-3 is released to the ground, where it is exposed to stormwater. Mr. Epperson said that the facility had tentative plans to extend the trench to vats 1-3 during the next boiler shutdown, which was scheduled for October 2016.
- I inspected the tanks and pumps (**Photo 28**) used to control steam condensate from the plywood plant. Mr. Epperson said that the pumps were leaking and I observed steam condensate on the ground (**Photo 29**).

B. Raw Materials and Industrial Processes Exposed to Stormwater

Section 5.2.3 of the MSGP states that the SWPPP “must describe areas at your facility where industrial materials or activities are exposed to stormwater... Industrial materials or activities include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes...”

I noted that Section 2 of the SWPPP (**Attachment C**) identifies potential pollutant sources at the facility, but this list does not include certain raw materials, such as hog fuel (**Photos 3, 8-9, 11-12 and 27**), wood chips (**Photo 27**) and sawdust (**Photo 28**), or certain process waters such as log vat water (**Photos 23-25**) and steam condensate (**Photos 28-29**), that I observed during the inspection.

C. Containers Susceptible to Uncontained Spillage or Leakage

Section 2.1.2.1 of the MSGP requires the permittee to “locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge.”

AND

Section 2.1.2.4 of the MSGP states that “you must conduct spill prevention and response measures, including but not limited to, the following:

- Plainly label containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.”

During the inspection I observed the following containers of industrial fluid located outside with exposure to stormwater and without secondary containment. Unless otherwise noted, I did not see labels identifying the contents of the containers:

- A drum of parts washer solvent located outside the machine shop (**Photos 17-18**). I noted that the metal ring of the drum was not bolted to secure the lid of the drum.
- A bucket of oil located outside the machine shop (**Photo 19**). Mr. Epperson placed this bucket inside the machine shop during the inspection.
- Totes of compressor oil (**Photo 20**) located outside the boiler building. Mr. Epperson said that the totes had been left behind by the tribe and have been located in this area since before he started working at the facility approximately two years ago.
- A drum of defoamer, labeled as D-FOAM 325 (**Photo 21**), located outside the log vat building
- The concrete tank of hot liquid used to steam the log vats (**Photo 23**). I noted that the walls of this tank were cracked and stained and that moisture was visible on portions of the tank exterior. Mr. Epperson said that the hot liquid consisted of a mixture of recirculated log vat water and defoamer (**Photo 21**).

D. Accumulated Dust at the Base of the Baghouse

Section 2.1.2.3 of the MSGP requires proper operation and maintenance of “all industrial equipment and systems, in order to minimize pollutant discharges. This includes: ... immediately removing any accumulated dust at the base of the exterior baghouse.”

I inspected the bag house that collects dust from the sander in the plywood plant. In this area, I observed accumulated dust at the base of the exterior baghouse (**Photo 28**).

E. Dust Generation and Off-Site Vehicle Tracking

Section 2.1.1.10 of the MSGP states that “you must minimize generation of dust and off-site tracking of raw, final, or waste materials.”

At the unpaved delivery entrance to the facility, I observed the generation of dust (**Photo 32**) from industrial vehicle traffic and sediment tracked off-site onto Omak Avenue (**Photo 33**).

F. Woody Debris and Dust Generation

Section 8.A.3.1 of the MSGP requires the permittee to “perform good housekeeping to minimize the discharge of wood debris, leachate generated from decaying wood materials, and the generation of dust.”

I did not observe dust management practices at the time of the inspection, but Mr. Epperson said that the facility sprays the dirt access road along the eastern boundary of the facility for dust control. I observed dust in the following areas:

- The unpaved access road (**Photo 32**) to the delivery entrance on Omak Avenue
- The dirt access road along the eastern boundary of the property (**Photo 10**)
- The area around the bag house that collects sawdust from the sander in the plywood plant (**Photo 28**)

Although I did not observe a discharge at the time of the inspection, I observed multiple areas where wood debris could comingle with stormwater, including:

- Piles of hog fuel (**Photos 3, 8-9, 11-12 and 27**)
- Piles of wood chips (**Photo 27**)
- Piles of sawdust (**Photo 28**)

G. Open Dumpsters

Section 2.1.2.3 of the MSGP requires that the permittee “keep all dumpster lids closed when not in use.”

During the inspection, I observed multiple dumpsters (**Photos 14-16 and 30**) that were open and not in use.

H. Exposed Unstabilized Soils

Section 2.1.2.5 of the MSGP states that “you must minimize erosion by stabilizing exposed soils at your facility in order to minimize pollutant discharges... You must also use structural and non-structural control measures to minimize the discharge of sediment.”

During the inspection, I observed piles of soil (**Photo 8**) located above the unnamed creek along the eastern boundary of the property. I did not observe sediment control measures in this location. To the northeast of the plywood plant, I also inspected a catch basin, which was surrounded by dirt (**Photo 2**). I did not observe control measures in place to protect this catch basin from receiving sediment. I also noted that portions of the

stormwater catchment pond were heavily loaded with sediment (**Photo 4**) at the time of the inspection.

I. Salt Storage

Section 2.1.2.7 of the MSGP states that “you must enclose or cover storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, in order to minimize pollutant discharges. You must implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Piles do not need to be enclosed or covered pursuant to this permit if stormwater runoff from the piles is not discharged.”

AND

5.2.3.5 Salt Storage. You must document the location of any storage piles containing salt used for deicing or other commercial or industrial purposes.

To the south of the boiler, I observed bags of salt stacked on the pavement (**Photo 14**). On the south side of the log vat building, I observed bags of salt on the ground (**Photo 26**). During my review of the SWPPP, I did not see documentation of the location of salt storage areas at the facility.

J. Operation and Maintenance of the Catchment Pond

Section B.5 of Appendix B of the MSGP states that “you must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by you to achieve compliance with the conditions of this permit.”

During the inspection, I noted that portions of the facility’s stormwater catchment pond were heavily loaded with sediment (**Photo 4**). Mr. Epperson said that OFP had been trying to get a company to come and remove the sediment for approximately one and a half months before the inspection. The concern is that the continued accumulation of sediment in the pond could increase the likelihood of an overflow and unplanned discharge from the facility.

Mr. Epperson explained that stormwater from the pond is used to spray the log yard, so that no discharge occurs during normal operations. After the inspection, I noted that the Colville Tribal Tribune reported that OFP announced plans to close the facility again on January 29, 2017.² If the facility closes, it is unclear whether stormwater will continue to be pumped and sprayed onto the log yard and whether the pond will be monitored, operated and maintained to prevent or control discharges from the facility.

K. Operation and Maintenance of Plant Equipment and Systems

Section 2.1.2.3 of the MSGP requires proper operation and maintenance of “all industrial equipment and systems, in order to minimize pollutant discharges. This includes: ...plant equipment and systems that could fail and result in contamination of stormwater.”

² http://www.tribaltribune.com/news/article_d748fb26-c0d3-11e6-b2f9-1b65c425f1ad.html

I inspected the tanks and pumps used to collect and control steam condensate on the south side of the plywood plant (**Photo 28**). Mr. Epperson said that the pumps were leaking and I observed steam condensate on the ground (**Photo 29**) with exposure to stormwater.

I also inspected the concrete tank that contained hot liquid used to steam the log vats. I noted that the walls of this tank were cracked and stained (**Photo 23**) and that moisture was visible on portions of the tank exterior. Mr. Epperson said that the hot liquid consisted of a mixture of recirculated log vat water and defoamer (**Photo 21**). I noted that a tank failure could cause this process water to contaminate stormwater in this area.

During the inspection, I also observed areas where potable water was leaking at the facility (**Photos 1 and 12**). Mr. Epperson said there were multiple leaks in the tribal water distribution system throughout the property. Although potable water is specified as an allowable non-stormwater discharge under Section 1.1.3.1 of the MSGP, I noted that these flows could commingle with contaminants or cause erosion at the facility.

L. On-Site Copy of the SWPPP

Section 5.4 of the MSGP states that “you must retain a complete copy of your current SWPPP required by this permit at the facility in any accessible format. A complete SWPPP includes any documents incorporated by reference and all documentation supporting your permit eligibility pursuant to Part 1.1 of this permit, as well as your signed and dated certification page. Regardless of the format, the SWPPP must be immediately available to facility employees, EPA, a state or tribe... at the time of an onsite inspection.”

I noted that the on-site SWPPP binder only included pages 1-11 and Appendices E, G, I and J of the SWPPP at the time of the inspection. The binder was also missing a signed and dated certification page. Mr. Epperson said that Ms. Chaney often works from home in the evenings and that additional stormwater documents were probably located off-site with her. Ms. Chaney had a doctor’s appointment and was unavailable on the day of the inspection.

M. Inspections and Assessments with the SWPPP

Section 5.5 of the MSGP states that “you are required to keep the following inspection, monitoring, and certification records with your SWPPP... all inspection reports, including the Routine Facility Inspection Reports (see Part 3.1.2) and Quarterly Visual Assessment Reports (see Part 3.2.2).”

During the inspection, I reviewed one quarterly stormwater inspection form and one quarterly stormwater visual assessment form, both dated December 21, 2015. Mr. Epperson said the remaining inspection and assessment records were located off-site with Ms. Chaney, who had a doctor’s appointment and was unavailable on the day of the inspection.

N. SPCC Plan with the SWPPP

Section 5.2 of the MSGP states that “where your SWPPP refers to procedures in other facility documents, such as a Spill Prevention, Control and Countermeasure (SPCC) Plan or an Environmental Management System (EMS), copies of the relevant portions of those documents must be kept with your SWPPP.”

I noted that Tables 5 and 6 of the SWPPP include references to the facility’s SPCC plan. I looked inside a binder labeled as the SPCC plan during the inspection. I noted that the binder contained template checklist forms, but not an actual plan. Mr. Epperson said that the full SPCC plan may be located off-site with Ms. Chaney, who often works from home in the evenings. Ms. Chaney had a doctor’s appointment and was unavailable on the day of the inspection.

O. SWPPP Map

Section 5.2.2 of the MSGP states that the SWPPP must include a map showing “locations of all stormwater conveyances including ditches, pipes, and swales... Locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall 001, 002).”

I noted that the SWPPP site map (**Attachment A**) did not include the location of stormwater conveyance pipes or outfalls with unique identification codes. The SWPPP site map does include a “sample collection point,” but the SWPPP does not specify whether this collection point would also serve as an outfall in the event of a discharge.

X. Closing Conference

I held a closing conference with Mr. Epperson. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

Report Completion Date:

Lead Inspector Signature:

ATTACHMENT A – Site Plan & Aerial Image



Aerial Image of the Facility from Google Earth Pro

ATTACHMENT B – Photograph Log

(Photographs were taken by Matt Vojik on September 15, 2017 with a Panasonic DMC-FH25 camera)



Photo 1 / P1020739 – Easterly view of a catch basin receiving flow from a broken water main in the paved area southwest of the plywood plant



Photo 2 / P1020742 – Northerly view of the facility from the west corner of the plywood plant. A catch basin appears in the foreground.



Photo 3 / P1020666 – Southeasterly view of the location of a buried catch basin. The log vat building and a pile of hog fuel appear in the background.



Photo 4 / P1020732 – Westerly view of sediment accumulated in the catchment pond along the northern boundary of the facility



Photo 5 / P1020728 – Sump located in the northeast corner of the facility at the east end of the catchment pond. The sump receives a combination of pumped well water and flow from the catchment pond for use in watering the log yard.



Photo 6 / P1020731 – Southwesterly view of the log pile area from Omak Avenue. The catchment pond appears in the foreground.



Photo 7 / P1020722 – Southerly view of the east side of the log yard. A small berm appears in the center along a dirt access road and silt fencing appears on the left along the bank of an unnamed creek.



Photo 8 / P1020719 – Northerly view of a pile of hog fuel (foreground) and soil piles (background) along the eastern boundary of the facility. The bank of the unnamed creek appears on the right. This is a cropped version of the original photograph.



Photo 9 / P1020713 – Southerly view of the eastern boundary of the facility. Piles of hog fuel appear on the right and the vegetated bank of the unnamed creek appears on the left.



Photo 10 / P1020714 – Northerly view of the eastern boundary of the facility. On the dirt road in the distance, a small cloud of dust is visible behind a utility truck. The vegetated bank of the unnamed creek appears on the right. This is a cropped version of the original photograph.



Photo 11 / P1020712 – Westerly view of the boiler and hog fuel processing area



Photo 12 / P1020698 – Northerly view of the hog fuel conveyor and leaking water spigot. Piles of hog fuel appear on the right.



Photo 13 / P1020709 – Detail view of wet ash scrubbed from the boiler exhaust



Photo 14 / P1020692 – Northerly view of an open dumpster and bags of salt stored on the paved area on the south side of the boiler



Photo 15 / P1020708 – Open scrap metal dumpster located outside the machine shop



Photo 16 / P1020701 – View inside an open dumpster containing a broken fluorescent lamp located outside the machine shop.



Photo 17 / P1020707 – Materials stored outside the machine shop, including an orange drum of parts washer solvent



Photo 18 / P1020706 – View inside a drum containing parts washer solvent located outside the machine shop



Photo 19 / P1020702 – An open bucket of oil located outside the machine shop



Photo 20 / P1020687 – Totes of dark fluid located outside the boiler building. This is a cropped version of the original photograph.

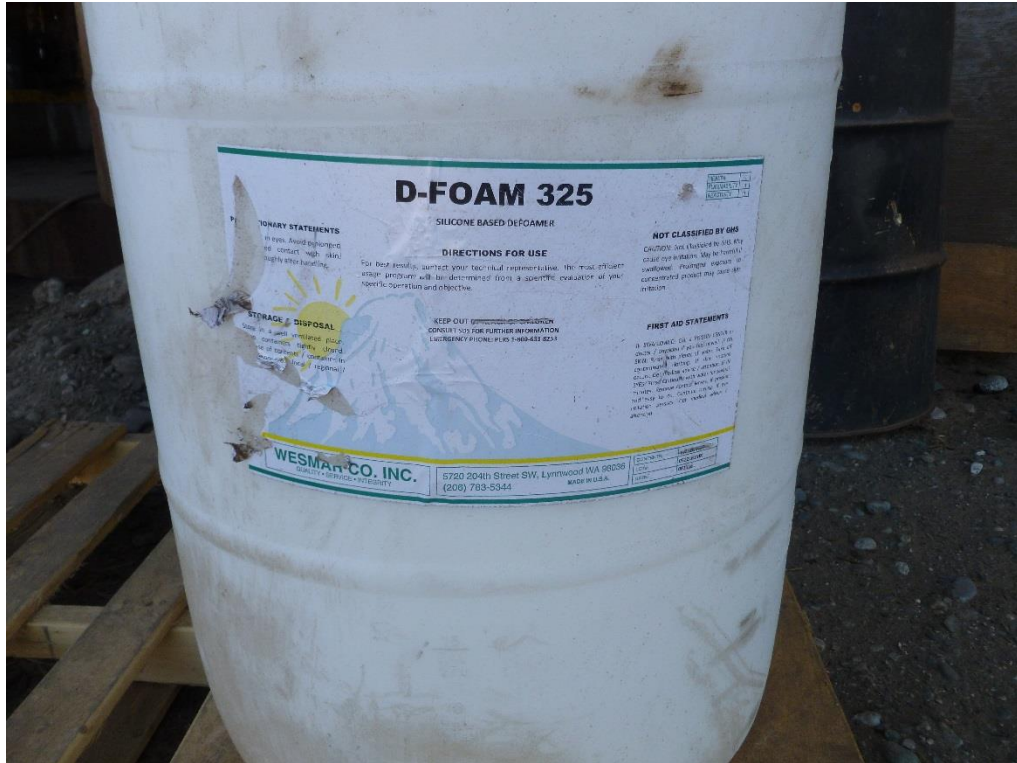


Photo 21 / P1020678 – A drum of defoamer (D-FOAM 325) stored outside the log vat building



Photo 22 / P1020677 – Totes of dark fluid stored outside the log vat building



Photo 23 / P1020679 – Northeasterly view of the log vat sprinkler tank. A tote of dark fluid appears in the foreground. Moisture is visible on the left side of the tank.



Photo 24 / P1020669 – View inside log vat 9



Photo 25 / P1020667 – Recirculation trench and sump that collects flow from vats 4 through 11



Photo 26 / P1020683 – Bags of salt on the ground on the south side of the log vat building. This is a cropped version of the original photograph.



Photo 27 / P1020672 – Piles of wood chips and hog fuel located on the west side of the facility



Photo 28 / P1020665 – Bag house (right) and steam vent (left) on the south side of the plywood plant. Steam condensate is controlled by tanks and pumps that appear under the vent pipes.



Photo 29 / P1020662 – Steam condensate overflow from the plywood plant. This is a cropped version of the original photograph.



Photo 30 / P1020744 – Westerly view of stacked metal rods, wood pallets and an open dumpster in the parking lot of the plywood plant. This is a cropped version of the original photograph.



Photo 31 / P1020749 – Fuel tanks



Photo 32 / P1020734 – Southerly view of the delivery entrance from Omak Avenue. Dust appears in the air in the background.



Photo 33 / P1020735 – Westerly view of the delivery entrance from Omak Avenue

Complete list of photographs taken during the inspection:

- P1020661 – White board inside the safety and environmental office
- P1020662 – Steam condensate overflow from the plywood plant
- P1020663 – Steam vent on the south side of the plywood plant
- P1020664 – Steam condensate tanks on the south side of the plywood plant
- P1020665 – Bag house and steam vent on the south side of the plywood plant
- P1020666 – Southeasterly view of the location of a buried catch basin. The log vat building appears in the background
- P1020667 – Recirculation trench and sump that collects flow from vats 4 through 11
- P1020668 – Recirculation trench and sump that collects flow from vats 4 through 11
- P1020669 – View inside log vat 9
- P1020670 – View inside log vat 9
- P1020671 – View inside log vat 9. Sprinklers are visible on the ceiling.
- P1020672 – Piles of wood chips and hog fuel located on the west side of the facility
- P1020673 – Totes of dark fluid stored outside the log vat building
- P1020674 – View inside the pump house at the log vat building
- P1020675 – View inside the pump house at the log vat building
- P1020676 – Empty drums and a drum containing defoamer stored on a pallet outside the log vat building
- P1020677 – Totes of dark fluid stored outside the log vat building
- P1020678 – A drum of defoamer (D-FOAM 325) stored outside the log vat building
- P1020679 – Northeasterly view of the log vat sprinkler tank. A tote of dark fluid appears in the foreground.
- P1020680 – Northerly view of the log vat building
- P1020681 – Southwesterly view of the rejected lumber storage area
- P1020682 – Southerly view of the rejected lumber storage area
- P1020683 – Bags of salt on the ground on the south side of the log vat building
- P1020684 – An oil dispensing hose, no longer in use, on the east side of the log vats
- P1020685 – A pile of debris that has been scraped from the log vats
- P1020686 – Westerly view of a material storage area located to the west of the southwestern portion of the facility
- P1020687 – Totes of dark fluid located outside the boiler building
- P1020688 – View of discarded salt bags inside an open dumpster located on the south side of the boiler
- P1020689 – Northerly view of the boiler
- P1020690 – Northerly view of the western portion of the facility
- P1020691 – View inside an open dumpster located on the south side of the boiler
- P1020692 – Northerly view of an open dumpster and bags of salt stored on the paved area on the south side of the boiler
- P1020693 – Northerly view of the boiler. Flow from a water main break appears in the foreground.

- P1020694 – Westerly view of flow from a water main break at the facility in the direction of a material storage area located outside the southwestern boundary of the facility
- P1020695 – Northwesterly view of the mechanic shop
- P1020696 – Westerly view of the mechanic shop
- P1020697 – Northeasterly view of the hog fuel storage area
- P1020698 – Northerly view of the hog fuel conveyor and leaking water spigot
- P1020699 – Northwesterly view of flow from a water main break on the south side of the machine shop
- P1020700 – Westerly view of flow from a water main break on the south side of the machine shop
- P1020701 – View inside an open dumpster containing a broken fluorescent lamp located outside the machine shop.
- P1020702 – An open bucket of oil located outside the machine shop
- P1020703 – An open bucket of oil being placed inside the machine shop
- P1020704 – An orange drum located outside the machine shop. The contents were identified as parts washer solvent.
- P1020705 – View inside a drum containing parts washer solvent located outside the machine shop
- P1020706 – View inside a drum containing parts washer solvent located outside the machine shop
- P1020707 – Materials stored outside the machine shop, including an orange drum of parts washer solvent
- P1020708 – Open scrap metal dumpster located outside the machine shop
- P1020709 – Detail view of wet ash scrubbed from the boiler exhaust
- P1020710 – Northerly view of the boiler
- P1020711 – Northerly view of the hog fuel storage area in the southeast corner of the facility
- P1020712 – Westerly view of the boiler and hog fuel processing area
- P1020713 – Southerly view of the eastern boundary of the facility
- P1020714 – Northerly view of the eastern boundary of the facility
- P1020715 – Northwesterly view of the facility
- P1020716 – Westerly view of the facility
- P1020717 – Southwesterly view of the facility
- P1020718 – Southwesterly view of the facility
- P1020719 – Northerly view of soil piles along the eastern boundary of the facility
- P1020720 – Northerly view of the log yard
- P1020721 – Southwesterly view of the plywood plant
- P1020722 – Southerly view of the east side of the log yard. Silt fencing appears on the left along the bank of an unnamed creek.
- P1020723 – Southerly view of the east side of the log yard. The bank of an unnamed creek appears on the left.

- P1020724 – Southwesterly view of the east side of the log yard
- P1020725 – Southerly view of the east side of the log yard
- P1020726 – Sump located in the northeast corner of the facility at the east end of the catchment pond. The sump receives a combination of pumped well water and flow from the catchment pond for use in watering the log yard.
- P1020727 – View inside a decommissioned vault in the northeast corner of the facility
- P1020728 – Sump located in the northeast corner of the facility at the east end of the catchment pond. The sump receives a combination of pumped well water and flow from the catchment pond for use in watering the log yard.
- P1020729 – Easterly view of Omak Avenue from the northeast corner of the facility
- P1020730 – Sump located in the northeast corner of the facility at the east end of the catchment pond
- P1020731 – Southwesterly view of the log pile area from Omak Avenue. The catchment pond appears in the foreground.
- P1020732 – Westerly view of sediment accumulated in the catchment pond along the northern boundary of the facility
- P1020733 – Southerly view of the facility from Omak Avenue. The catchment pond appears in the foreground
- P1020734 – Southerly view of the delivery entrance from Omak Avenue
- P1020735 – Westerly view of the delivery entrance from Omak Avenue
- P1020736 – Northwesterly view of the delivery entrance from Omak Avenue
- P1020737 – Welcome sign at the entrance to the facility
- P1020738 – Easterly view of the paved area located southwest of the plywood plant
- P1020739 – Easterly view of a catch basin receiving flow from a broken water main in the paved area southwest of the plywood plant
- P1020740 – Northerly view of the facility from the west corner of the plywood plant.
- P1020741 – Detail view of the catch basin near the west corner of the plywood plant
- P1020742 – Northerly view of the facility from the west corner of the plywood plant. A catch basin appears in the foreground.
- P1020743 – View inside an open dumpster in the parking lot of the plywood plant
- P1020744 – Westerly view of stacked metal rods, wood pallets and an open dumpster in the parking lot of the plywood plant
- P1020745 – Quarterly Storm Water Inspection Form dated December 21, 2015
- P1020746 – Quarterly Storm Water Inspection Form dated December 21, 2015
- P1020747 – Quarterly Storm Water Visual Assessment Form dated December 21, 2015
- P1020748 – Unused fuel tanks belonging to the tribe
- P1020749 – Fuel tanks
- P1020750 – Northeasterly view of the fuel tanks. A spill kit was located on the far side of the bay doors of the plywood plant that appears in the background
- P1020751 – Northerly view of dried glue on the pavement (foreground), open dumpster (left) and plywood plant (background)

ATTACHMENT C – CD of Electronic Files

Contents:

- Archival original photographs
- SWPPP dated February 2015